



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 02 2018

Re: PMN P-18-0233

Dear [REDACTED]:

This letter responds to the above-referenced Premanufacture Notice (PMN), received by the Environmental Protection Agency (EPA) on July 6th, 2018. The PMN described the chemical substance as Alkyl Alkenoic acid, alkyl ester, telomer with alkylthiol, substituted carbomonocycle, substituted alkyl alkyl alkenoate and hydroxyalkyl alkenoate, tert-butyl alkyl peroxyoate-initiated.

EPA has determined in accordance with section 5(a)(3)(C) that this PMN substance is unlikely to present an unreasonable risk of injury to health or the environment under the intended and reasonably foreseen conditions of use. Attached to this letter is a summary of the basis of EPA's determination. EPA has also identified certain circumstances of use that – while not known, intended, or reasonably foreseen conditions of use – EPA may consider to be significant new uses requiring further review. As such, EPA is considering issuing a follow-up Significant New Use Rule (SNUR) designating the following as significant new uses:

- Manufacture in solid form

Under TSCA section 5(g), you may begin manufacture of this PMN substance immediately and do not need to wait for the 90-day review period to expire.

Please note that 40 CFR 720.102 requires you, within the first 30 days of commencement of manufacture (which includes import) of a PMN substance, to submit a Notice of Commencement (NOC) to EPA. If you wish the chemical identity to be listed on the Confidential Inventory, any prior claim of confidentiality must be reasserted and substantiated in accordance with 40 CFR 720.85(b) and 720.90(b).

Because you submitted your PMN to EPA after the effective date of the electronic-PMN ("eTSCA/ePMN") final rule (75 FR 773), you must use the eTSCA/ePMN software to submit your NOC. After April 6, 2012, all submissions are required to be submitted electronically via the internet using the Central Data Exchange (CDX). Please see www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/how-submit-e-pmn for more information on the e-PMN software and directions on how to register and submit notices via CDX.

If you have any questions or comments, please contact me at (202) 564-8469.

Sincerely,

Greg Schweer, Chief
New Chemicals Management Branch